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VIA ECF

Analisa Torres, United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
Torres_NYSDChambers@nysd.uscourts.gov

**Re: *UMG Recordings, Inc., et al. v. Frontier Communications Corporation*,
Case No. 1:21-cv-05050-AT; *In re Frontier Communications Corporation*,
Case No. 1:21-cv-05253-AT (related case)**

Dear Judge Torres:

Pursuant to Your Honor's Individual Practices, the parties submit this joint letter in connection with Plaintiffs' Motion to Withdraw the Bankruptcy Reference filed on June 14, 2021 in *In re Frontier Communications Corporation*, Case No. 1:21-cv-05253-UA [ECF No. 1]. Plaintiffs originally filed the motion in the bankruptcy proceeding *In re Frontier Communications Corporation*, Case No. 20-22476 (RDD) on June 9, 2021 [ECF No. 1898], the motion was transferred to the U.S. District Court of the Southern District of New York, and today the case was accepted as related to *UMG Recordings, Inc., et al. v. Frontier Communications Corporation*, Case No. 1:21-cv-05050-AT.

The parties jointly respectfully request that the Court waive the pre-motion letter requirement for the filing of Plaintiffs' motion. The parties have stipulated to, and jointly request that the Court enter, the following briefing schedule for this motion: Defendant/Debtor's response will be due June 24, 2021, and Plaintiffs' reply will be due July 1, 2021.

Sincerely,

/s/ Matthew J. Oppenheim
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